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Attorneys for BNSF Railway Company

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION**

KEITH JONES,) Cause No. CV-18-146- DLC
)
Plaintiff,)
) BNSF'S MOTION FOR
vs.) PROTECTIVE ORDER QUASHING
) PLAINTIFF'S RULE 30(b)(6)
BNSF RAILWAY COMPANY,) DEPOSITIONS
a Delaware corporation,)
)
Defendant.)
_____)

Defendant BNSF Railway Company (“BNSF”) hereby respectfully moves the Court to enter an order that Plaintiff’s noticed Rule 30(b)(6) depositions scheduled to take place October 18, 2019, not be had. For the reasons set forth in the supporting brief filed concurrently herewith, the depositions constitute an annoyance, are oppressive, and expose BNSF to undue burden and expense. As such, pursuant to Rule 26(c)(1)(A), F.R.Civ.P., the depositions should be forbidden and quashed by the Court.

Counsel for BNSF hereby certifies, pursuant to Rule 26(c)(1), F.R.Civ.P., that the parties have conferred in good faith in an unsuccessful effort to resolve the dispute without Court action. Counsel for Plaintiff objects to this motion.

DATED this 11th day of October, 2019.

HEDGER FRIEND, P.L.L.C.

By: /s/ Michelle T. Friend
Attorney for BNSF Railway Company

CERTIFICATE OF SERVICE

I, the undersigned, a representative of the law firm of Hedger Friend, P.L.L.C., hereby certify that I served a true and complete copy of the foregoing “ ” on the following persons by the following means:

1, 2 CM/ECF
_____ Hand Delivery
_____ Mail
_____ Overnight Delivery Service
_____ Fax
_____ E-Mail

1. Clerk, U.S. District Court
2. William G. Jungbauer
 Christopher W. Bowman
 Yaeger & Jungbauer Barristers, PLC
 4601 Weston Woods Way
 St. Paul, MN 55127

DATE: 10/11/2019

/s/ Michelle T. Friend.